

EXHIBIT 1

JONES DAY

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July 27, 2007

VIA EMAIL

M. Justin Draycott, Esq.
Patrick Henry Building
601 D Street, N.W.
Washington, D.C. 20004

Ana Maria Martinez, Esq.
Assistant United States Attorney
Southern District of Florida
99 N.E. 4th Street
Miami, FL 33132

Re: *United States ex rel. Ven-A-Care of the Florida Keys v. Abbott Laboratories, Inc.*

Dear Counsel:

In accordance with the CMO applicable to our case, please provide suggested deposition dates for each of the following current and former government employees:

- Kathleen Buto
- Ira Burney
- Debbie Cheng
- Tom Gustafson
- Randall Grayden
- Robert Niemann
- Larry Reed

Please also provide a suggested date for the following witness(es) pursuant to Rule 30(b)(6):

- One or more witnesses who can describe in detail the manner in which the amount paid and/or the amount allowed was determined for each claim as to which the plaintiffs seek damages in this case. The witness(es) should be able to describe specifically how any applicable “median AWP” was calculated and what array of prices was used in that calculation for the entire time period and for all drugs at issue in this matter. The witness(es) should further be able to describe how the relevant Medicaid Programs determined the amounts paid for claims that are at issue in this matter.

Additionally, we request that you provide the date by which the DOJ will complete its production of documents (hard-copy and electronic) for each individual. To ensure that we do not receive yet another eleventh hour production on the eve of deposition, we further ask that this date be at least five business days prior to the deposition. To the extent that key word searches

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July 27, 2007
Page 2

are utilized to locate responsive or potentially responsive electronic documents and/or emails, please inform us of your methodology and provide a list of the key words used.

Sincerely,

/s

R. Christopher Cook

cc: Renée Brooker
Gejaa Gobena
John K. Neal
Mark A. Lavine
Ann St. Peter-Griffith
James J. Breen
Alison Simon
Neil Merkl
Sarah L. Reid
Eric Gortner